

DOAR RIECK KALEY & MACK

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JOHN F. KALEY
e-mail: firm@doarlaw.com
website: www.doarlaw.com

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037

June 7, 2024


Via ECF Filing

Honorable Ronnie Abrams
United States District Judge
40 Foley Square
New York, New York 10007

Application granted. The conference is adjourned to July 16, 2024 at 2:30 p.m. Time is excluded until July 16, 2024, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

Re: *United States v. Concepcion Aquino*
Docket # 18 Cr. 640 (RA) (DRH)

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 7, 2024

Dear Judge Abrams:

I represent the defendant Isaac Concepcion Aquino in the above-referenced matter. There presently is scheduled a status conference on June 12, 2024 at 11:00 a.m. I write now with the consent of the Government to request that the conference be adjourned for approximately 30 days on a date convenient to the Court. The reason for this request is that the discovery in this case is quite substantial and more time is needed for me to "get a handle on it" as I have been involved in several other matters where the discovery also is quite voluminous. One matter in particular, *U.S. v. Herrera*, 23 Cr. 504 (JSR), involving the death of an infant from fentanyl poisoning at a Daycare facility in the Bronx, was particularly time-consuming. That matter was resolved two weeks ago and my client in that case is now awaiting sentencing. The discovery in that case was substantial and involved several scientific issues all of which occupied much of my time.

In this case, the discovery is quite large and there are several electronic devices that need to be reviewed. Additionally, I am trying to obtain documents from the Dominican Republic to determine whether Mr. Aquino was brought to the United States legally from the Dominican Republic where he was arrested in connection with this case. Now that I am better able to spend the time needed to unravel the discovery, evidence and legal issues that may be present in the case, it is my thinking that an adjournment of approximately 30 days would allow me the time to

Honorable Ronnie Abrams

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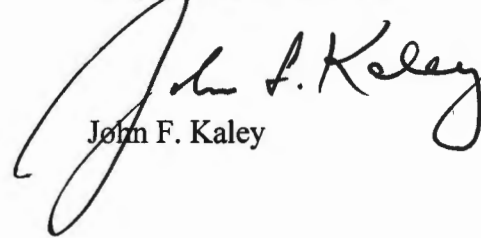
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do that and also to engage in discussions with the Government as to any possible resolution of this matter short of motion practice and/or trial.

Accordingly, for the reasons set forth herein, I write to respectfully request that the status conference scheduled for June 12, 2024 be adjourned for approximately 30 days. On behalf of Mr. Aquino, I consent to an exclusion of time under the Speedy Trial Act for the period of the adjournment were it to be granted by the Court.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John F. Kaley". The signature is fluid and cursive, with a large loop at the end of the last name.

John F. Kaley

cc: AUSA Michael Neff
(via ECF filing and email)